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October 12, 2000

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OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: Order and Further Notice of Proposed Rulemaking released August 31, 2000;  
Federal-State Joint Board on Universal Service; Promoting Deployment and  
Subscribership in Unserved and Underserved Areas, Including Tribal and Insular  
Areas, CC Docket No. 96-45

Dear Ms. Roman Salas:

Submitted for filing herewith, per captioned Order and Further Notice of Proposed Rulemaking, are the original and four copies of the Comments of SBC Communications Inc. We are also submitting these Comments on diskette, along with three paper copies, to Sheryl Todd, Accounting Policy Division, Common Carrier Bureau, Federal Communications Commission, 445 Twelfth Street, SW, Room 5-B540, Washington, D.C. 20554. Additionally, we are sending a diskette copy of the Comments to International Transcription Service, Inc. 1231 20<sup>th</sup> Street, NW, Washington, D.C. 20037.

Thank you for your assistance in this matter and let me know if you have any questions.

  
Charles J. Schamberg  
Senior Counsel

Attachments.

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington D.C. 20554**

In the Matter of Federal-State Joint Board	)	
on Universal Service; Promoting	)	
Deployment and Subscribership	)	CC Docket No. 96-45
in Unserved and Underserved Areas,	)	
Including Tribal and Insular Areas	)	

**COMMENTS OF SBC COMMUNICATIONS INC.**

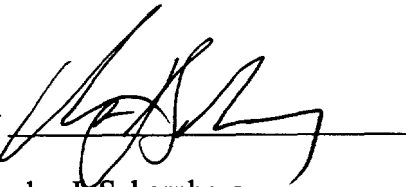
SBC Communications Inc. (SBC) submits its initial Comments pursuant to the Order and Further Notice of Proposed Rulemaking (OFNP) released on August 31, 2000. SBC does not oppose extending enhanced Lifeline and Link up benefits to clearly defined areas on "near reservations" characterized by geographic isolation, high rates of poverty, and low telephone subscribership -- factors relied upon in the Commission's Twelfth Report and Order to justify these benefits in tribal lands generally. However, as the Commission acknowledged in the OFNP, enhanced Lifeline and Link up benefits should not be extended to areas within "near reservations" -- or elsewhere -- which lack these characteristics. There is no perfect or easy way to draw the line between "qualifying" and "non-qualifying" areas within "near reservations" but the line should be made clear enough that state commissions, carriers and subscribers can readily determine eligibility without room for dispute. SBC recommends that the Commission work with the BIA to put these boundaries in ARCVIEW shape files or ARC/INFO file format. These are commonly and widely used formats for geographic information systems (GIS) boundary files. This will allow all telephone companies access to the same information in a standardized format.

Beyond this, SBC is not aware of any procedure or formula that can be generally applied to determine where to target enhanced Lifeline and Link up benefits in areas outside existing reservations. Since “near reservations” include areas that are not isolated, impoverished and under served, that designation alone cannot be useful for targeting support to such regions except as a place to start the inquiry. The individual characteristics of every “near reservation” would have to be studied to do the job right. In such an inquiry, the only workable general principle is to exclude urban and metropolitan areas since, by definition, they are not isolated and are clearly less likely to possess the other characteristics found to warrant enhanced support. Moreover, extending enhanced support to urban and metropolitan areas on near reservations which differ little from such areas elsewhere clearly raises issues of discrimination.

That being said, SBC would support any reasonable attempt to target enhanced support to areas within near reservations possessing the characteristics cited by the Commission to justify such support. SBC is principally concerned that these areas be clearly defined, as described above, to facilitate implementation.

Respectfully submitted,

SBC COMMUNICATIONS INC.

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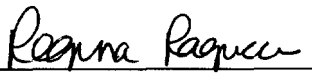
202-326-8893

Its Attorneys

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**CERTIFICATE OF SERVICE**

I, Regina Ragucci, do hereby certify that on this 12th day of October 2000, Comments of SBC Communications Inc., CC Docket No. 96-45 was served first class mail - pre-paid postage to the parties attached.

  
Regina Ragucci

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